

SARAH MOLINA, et al., )  
)  
Plaintiffs, )  
)  
v. ) Case No.: 4:17-cv-2498 AGF  
)  
)  
CITY OF ST. LOUIS, MISSOURI, et al., )  
)  
Defendants. )

I, Steven Hoffmann, declare as follows:

- Pls.' Ex. 10

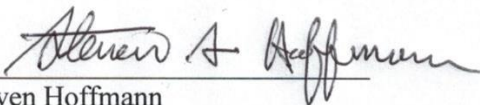
7. I saw SLMPD officers deploy tear gas against people who were unarmed, non-threatening, nonviolent, and not engaged in any crime.

8. At the Arsenal and Grand protest, I also saw officers deploy tear gas for the same reasons and against non-threatening people.

9. At the Vandeventer and Manchester/Chouteau protest, officers launched chemical munitions at me as I complied with their order to cross the street from the east sidewalk to the west sidewalk. They made this order despite the fact that I was across a parking lot from where officers were carrying out arrests and standing on a public sidewalk and was not committing any crime, causing any threat, or interfering with any police activities. They then punished me for obeying their order by subjecting me to tear gas.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 12 day of August, 2020

By:   
Steven Hoffmann